

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

WILLIAM T. WALTERS  
a/k/a "Billy,"

*Defendant.*

**ECF CASE**

S1 16 CR. 338 (PKC)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the Declaration of Paul H. Schoeman, Esq., dated September 23, 2016, the exhibits attached thereto, the accompanying Memorandum of Law, and all prior papers and proceedings in this action, defendant William T. Walters, by his undersigned attorneys, will move this Court before the Honorable P. Kevin Castel, at the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order: (1) compelling the government, pursuant to Fed. R. Crim. P. 7(f), to provide a Bill of Particulars; (2) compelling the government to review information within the possession of the Securities and Exchange Commission in order to comply with disclosure obligations; and (3) for a pre-trial hearing and remedial measures to address government misconduct during the investigation leading to the indictment in this case.

Dated: New York, New York  
September 23, 2016

Respectfully submitted,

By: /s/ Barry H. Berke  
Barry H. Berke  
Paul H. Schoeman

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